

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

DONALD J. TRUMP,

Plaintiff,

v.

Civil Action No. 1:19-cv-2173-CJN

COMMITTEE ON WAYS AND MEANS,  
UNITED STATES HOUSE OF  
REPRESENTATIVES; LETITIA JAMES, in  
her official capacity as Attorney General of  
New York State; and MICHAEL R.  
SCHMIDT, in his official capacity as  
Commissioner of the New York State  
Department of Taxation and Finance,

Defendants.

**JOINT STIPULATION OF PLAINTIFF AND NEW YORK DEFENDANTS**

Last Friday, the New York Defendants filed a motion to dismiss for lack of personal jurisdiction and improper venue. *See* Doc. 26. Plaintiff's response to that motion is currently due by August 19, the New York Defendants' reply is currently due by August 23, and oral argument is currently scheduled for August 29. *See* Doc. 25 at 3. Plaintiff plans to exercise his right to amend the complaint, which will moot the New York Defendants' present motion. Plaintiff and the New York Defendants have thus negotiated, and ask this Court to approve, the following revised schedule:

1. Plaintiff will file an amended complaint on or before August 19, 2019.
2. The New York Defendants will file a new motion to dismiss for lack of personal jurisdiction and/or improper venue on or before August 29, 2019.
3. Plaintiff will file an opposition to the New York Defendants' new motion on or before September 9, 2019.
4. The New York Defendants will file a reply in support of their new motion on or before September 13, 2019.
5. Plaintiff and the New York Defendants respectfully ask the Court to hold oral argument on the new motion during the week of September 16, 2019, excluding September 20 and the afternoon of September 19.

Plaintiff and the New York Defendants agree that the remainder of the Court's prior order will remain in effect. In other words, during the pendency of the new motion "and for a period of one week from the Court's decision on that Motion, the New York Defendants shall not deliver to the Committee any information concerning Mr. Trump that may be requested by Chairman Neal under the TRUST Act" and "shall promptly notify the Court and Mr. Trump" "should Chairman Neal make a request to the Commissioner under the TRUST Act for information concerning Mr. Trump." Doc. 25 at 4. Nothing "limits the New York Defendants or Mr. Trump from making any arguments or filings concerning the New York Defendants' Motion to Dismiss," nothing "limits Mr. Trump's ability to seek further or additional relief following the Court's decision on the New York Defendants' Motion," and nothing limits any party from making any other filing permitted under the federal and local rules. *Id.*\*

Dated: August 14, 2019

LETTITIA JAMES  
Attorney General of the State of New York

s/ Andrew Amer  
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James and Commissioner Michael R. Schmidt*

Respectfully submitted,

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*Counsel for Plaintiff President Donald J. Trump*

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\* The House Ways and Means Committee takes no position on this filing.